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Attorneys for Plaintiff Zhang Ziyi

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ZHANG ZIYI, an individual,

Plaintiff,

v.

CHINA FREE PRESS, INC., a North
Carolina non-profit corporation doing
business as BOXUN NEWS; WEICAN
NULL MENG, an individual also known
as WATSON MENG and also known as
WEICAN “WATSON” MENG; DOES 1-
25, inclusive,

Defendants.

CASE NO.: 2:12-cv-05216-DMG
(PLAx)

**STIPULATION TO CONTINUE
HEARING ON MOTIONS FILED
BY DEFENDANT WEICAN NULL
“WATSON” MENG**

1 This Stipulation is by and between Plaintiff Zhang Ziyi (“Plaintiff”), on the one
2 hand, and Defendant Weican Null Meng (“Meng”), on the other hand. Plaintiff and
3 Meng are collectively referred to as the Parties. This stipulation is made with
4 reference to the following facts:

5 RECITALS

6 1. On or about August 15, 2012, Meng filed Defendant Weican Null
7 “Watson” Meng’s Motion to Dismiss Complaint for Lack of Personal Jurisdiction
8 Pursuant to 12(b)(2) (“Motion to Dismiss”);

9 2. On or about August 16, 2012, the Court scheduled the hearing on
10 Meng’s Motion to Dismiss for September 21, 2012, at 9:30am;

11 3. On or about August 18, 2012, Meng filed Defendant Weican Null
12 Meng’s Special Motion to Strike Under California Civil Procedure § 425.16 (“Motion
13 to Strike”);

14 4. On or about August 20, 2012, Meng filed Defendant Weican Null
15 Meng’s Notice of Special Motion to Strike Under California Civil Procedure § 425.16
16 scheduling the hearing on his Motion to Strike for September 21, 2012, at 9:30am;
17 and

18 5. The parties have agreed to continue the date for the hearing on Meng’s
19 Motion to Dismiss and Motion to Strike for several weeks in order to give Plaintiff
20 time to conduct limited discovery, including, without limitation, the depositions of
21 Meng and Meng’s expert witness, Mary Hausch, for purposes of opposing the two
22 Motions. The scope of the discovery (including accompanying requests for
23 production of documents), will be limited to issues related to the Motion to Dismiss
24 and Motion to Strike.

STIPULATION

Based on the above facts, the Parties hereby stipulate, agree and ask the Court to order as follows:

1. The hearing on Meng's Motion to Dismiss and Motion to Strike shall be continued until October 12, 2012, at 9:30am.

DATED: August 31, 2012

GLASER WEIL FINK JACOBS
HOWARD AVCHEN & SHAPIRO LLP

By: /s/ Adam LeBerthon

JOHN MASON
PATRICIA L. GLASER
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Attorneys for Plaintiff Zhang Ziyi

DATED: August 31, 2012

RANDAZZA LEGAL GROUP

By: /s/ Marc J. Randazza

MARC J. RANDAZZA
JASON A. FISCHER
Attorneys for Defendant Weican Null Meng

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